

[counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SVB FINANCIAL GROUP,

Plaintiff,

v.

FEDERAL DEPOSIT INSURANCE
CORPORATION, as Receiver for Silicon
Valley Bank and Silicon Valley Bridge
Bank, N.A.,

Defendant.

Case No. 5:24-cv-01321-BLF

**JOINT STIPULATED CASE
SCHEDULE & ~~PROPOSED~~ ORDER**

JOINT STIPULATED CASE SCHEDULE & ~~PROPOSED~~ ORDER

Case No. 5:24-cv-01321-BLF

Pursuant to the Court’s instructions at the Initial Case Management Conference held on June 13, 2024, and the Court’s June 14, 2024 Case Management Order (Dkt. No. 45), the parties submit this proposed Joint Stipulated Case Schedule (“Case Schedule”), attached hereto as Appendix A.

WHEREAS, the parties submitted a Joint Case Management Statement on June 6, 2024 and attended the Initial Case Management Conference on June 13, 2024;

WHEREAS, following the Initial Case Management Conference, the Court issued an initial Case Management Order (Dkt. No. 45) establishing certain dates as part of the schedule in this case, and ordered the parties to submit a stipulated schedule establishing the remaining dates no later than July 12, 2024; and

WHEREAS, the parties have agreed to the Case Schedule included in Appendix A, attached hereto, which also includes in bold the dates already set by the Court’s Case Management Order (Dkt. No. 45).¹

NOW THEREFORE, the Parties hereby stipulate to and jointly move the Court for entry of the attached Case Scheduling Order.

IT IS SO STIPULATED.

¹ Defendant FDIC as Receiver has proposed this stipulated schedule based on the Court’s summary judgment and trial date rulings and will work diligently toward the completion of this schedule. Given the anticipated scope of fact and expert discovery and anticipated briefing on affirmative defenses (which shall be filed in connection with FDIC as Receiver’s Answer after the Court’s ruling on pending motions to dismiss), the FDIC as Receiver believes additional time will be necessary for the parties to complete discovery given the volume of anticipated document production, need for substantial third party discovery and significant number of anticipated depositions and expert reports.

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

Dated: July 19, 2024

Respectfully submitted,

/s/ Robert A. Sacks

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ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

Date: July 19, 2024

/s/ Robert A. Sacks

Robert A. Sacks

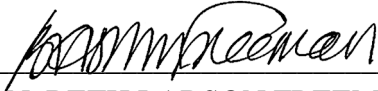
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~~PROPOSED~~ CASE SCHEDULING ORDER

The above Joint Stipulated Case Schedule & Proposed Order is approved as the Case Scheduling Order for this case and the parties shall comply with its provisions.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 19, 2024



HON. BETH LABSON FREEMAN
UNITED STATES DISTRICT JUDGE

EXHIBIT A

Deadline	Parties' Proposal
Deadline to Request Leave to Amend Pleadings	45 days following decision on motion to dismiss
Close of Party Document Discovery	January 31, 2025
Close of Fact Discovery	April 11, 2025
Deadline to Serve Opening Expert Reports	April 21, 2025
Deadline to Serve Rebuttal Expert Reports	May 19, 2025
Close of Expert Discovery	June 9, 2025
Parties' Cross Motions for Summary Judgment if both parties intend to make such motions	June 30, 2025
Daubert Motions	June 30, 2025
Parties' Responses to Cross Motions for Summary Judgment or, if only one party has moved, the other party's opposition	August 6, 2025
Oppositions to Daubert Motions	August 6, 2025
Reply in Further Support of Motion for Summary Judgment if only one party has moved for summary judgment	September 9, 2025
Replies in Support of Daubert Motions	September 9, 2025
Hearing on Motion(s) for Summary Judgment	October 2, 2025 at 9:00 a.m.
Deadline to File Motions in Limine	January 15, 2026
Oppositions to Motions in Limine	January 29, 2026
Deadline to File Joint Pretrial Statement	January 29, 2026
Proposed Finding of Facts and Conclusions of Law	January 29, 2026
Trial Brief (if any)	January 29, 2026
Final Pretrial Conference	February 12, 2026 at 1:30 p.m.

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Trial	March 23, 2026 at 9:00 a.m.
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